

F. Visitor Safety Rules

1. All visitors must sign in at the office prior to entering the Plant, yard or warehouse. This includes completing the Visitor Log, receiving a visitor pass and instructions concerning the following Visitor Safety Rules.
2. The speed limit in the Plant and yard shall not exceed 5 m.p.h.
3. Visitors are not allowed in the facility unless accompanied by an employee.
4. Visitors may not transfer any chemicals from one container to another while on the premises.
5. Smoking is prohibited in the Plant, warehouse or yard unless otherwise designated and as discussed on pages 12-13 of this chapter.

In addition to these general safety rules, visitors that enter the Plant, warehouse or yard must comply with the following rules.

6. All visitors entering the Plant, warehouse or yard areas will be issued the required personal protective equipment; i.e., side-shield safety glasses and an escape respirator. In addition, visitors must be instructed in the use of this personal protective equipment before entering these areas.
7. Visitors entering the Plant, warehouse or yard must be provided with a thorough safety brief as discussed above in Note 1.
8. To eliminate unnecessary exposure, all visitors must be properly attired; i.e., no shorts, tank tops, or sandals. Proper footwear must be worn at all times. If a driver is not dressed properly, then he/she must remain in their vehicle during loading and unloading.
9. Drivers must remain with their vehicles while loading and unloading. If a vehicle is in a position to be loaded, the wheels must be chocked and a trailer jack installed, if necessary.



OVERVIEW OF THE RMP MANAGEMENT SYSTEM

The Milford, Virginia Facility ("Milford Facility") is part of JCI Jones Chemicals, Inc. ("JCI"). The Milford Facility has developed a management system to oversee implementation of the risk management program elements to meet the requirements of the U.S. Environmental Protection Agency's (EPA's) Risk Management Program regulations as stated in 40 CFR Part 68 ("RMP regulations"; Appendix A). The Milford Facility's risk management program is summarized in its Risk Management Plan (RMP), which was submitted to the EPA on June 18, 2004. A qualified person has been assigned overall responsibility for the development, implementation, and integration of the risk management program elements, as certified in the RMP Management Statement of Commitments which is included in this manual. The management activities include the following:

- **Planning** - The Milford Facility has an overall risk management program policy that clearly identifies the goals and objectives of the risk management program.
- **Organizing** - Members of management and designated individuals are responsible for developing written procedures for each risk management program element that meets the previously identified goals and objectives, and both integrating and coordinating the risk management program elements during the monthly safety meetings. These individuals are listed below:

Timothy Gaffney - Executive Vice President

Dan Casmev - Vice President of Security - RMP Coordinator

Mike Croke - Vice President of South Region - Branch RMP Coordinator

Mike Washington - Manager - Asst. Branch RMP Coordinator

- **Implementing** - Designated Branch personnel are responsible for providing training to all applicable persons regarding initiating the procedure, implementing the procedure, and documenting the procedure. Personnel are provided with initial training in the applicable risk management procedures. Refresher training is provided on an as-needed basis, but is conducted at a minimum following any changes to the procedure or following reauthorization.
- **Controlling** - Members of management and the individuals responsible for each risk management prevention program element periodically conduct internal reviews or audits and compare the results against the goals and objectives of the element. Annually, the procedures are reviewed, revised if necessary, and re-certified to ensure that they remain accurate and reflect the current practices.
- The specific activities covered by the management system are as follows: